

**UNITED STATES DISTRICT COURT**  
**WESTERN DISTRICT OF WASHINGTON**

ALENA KRILEY,

Plaintiff,

vs.

CHARLIE BROWNE,  
JAMIE PHIFER, STAFF MEMBER  
UNKNOWN NAME, ALL WOMEN'S  
CARE

Defendant

Case No.: 21-cv-1176-RSM

COMPLAINT

**COMPLAINT**

**PARTIES**

Plaintiff:

Alena Kriley is a citizen of Belarus and a resident of Illinois

1 Address: 1124 Lake St, #509, Chicago IL 60301, Cook County  
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3

4 Defendant No.1:

5 Charlie Browne, MD at All Women's Care, is a citizen of Washington  
6

7 Address: 9730 3<sup>rd</sup> Ave NE, #200, Seattle, WA 98115, King County  
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10 Defendant No.2:

11 Jamie Phifer, MD at All Women's Care, is a citizen of Washington  
12

13 Address: 9730 3rd Ave NE, #200, Seattle, WA 98115, King County  
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16 Defendant No.3:

17 Unknown name, Staff members at All Women's Care, is citizen of  
18

19 Washington  
20

21 Address: 9730 3rd Ave NE, #200, Seattle, WA 98115, King County  
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24 Defendant No.4:

25 All Women's Care is a clinic in Seattle, WA  
26

27 Address: 9730 3rd Ave NE, #200, Seattle, WA 98115, King County  
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## JURISDICTION AND VENUE

The United States District Court for the Western District of Washington is the appropriate venue based on diversity of citizenship 28 U.S. Code paragraph 1332 because:

- 1) the Plaintiff is a citizen of a foreign state and a resident of Illinois and all defendants are citizens of Washington state.
- 2) Plaintiff prays for judgement in excess of \$75,000.

Additional basis for federal jurisdiction in this case is federal question jurisdiction.

## STATEMENT OF CLAIM

I, Plaintiff Alena Kriley, complain of the Defendants Charlie Browne MD, Jamie Phifer MD, Unknown name Staff member at All Women's Care, individually and duly authorized agents and/or apparent agents of All Women's Care and state as follow.

This action is against Defendants for:

Count 1. Wrongful death claim

Count 2. Negligence

Count 3. Gross negligence

1 Count 4. Fraudulent Misrepresentation

2 Count 5. Fraudulent Concealment

3 Count 6. Undue influence

4 Count 7. Medical Battery

5 Count 8. Loss of chance

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10 The cause of this action arises from August 30 and August 31, 2018. At All  
11 Women's Care Defendants performed abortion on me without disclosing  
12 material facts of the procedure and the risks and consequences of the  
13 procedure. They did not disclose that the baby was at the stage of  
14 development when it could have survived outside of the uterus after birth,  
15 natural or induced, when supported by medicine. Had I knew this fact I  
16 would have not undergo the abortion. I am suffering devastating emotional  
17 pain. Employees did not explain to me the forms that I was given to sign  
18 and the risks and consequences of the procedure. If I was explained  
19 possibility of the devastating physical and emotional consequences I have  
20 suffered I would have not undergo the abortion. Defendants did not take  
21 appropriate patient's history and disregarded patient's history that was taken.  
22 Defendants did not consider but took advantage of my emotional and mental  
23 state, lack of knowledge in medical field, lack of understanding of medical  
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1 terms and language barrier. Defendants rushed me into abortion. When I  
2 tried to stop abortion I was told it was too late to stop it. During the abortion  
3 I was injured and suffered severe bleeding. Despite of the severe bleeding  
4 employees of the clinic did not examine me, did not call ambulance, they  
5 discharged me. As a result of Defendants actions I suffered catastrophic life  
6 changing damages. The Defendants actions caused permanent damage to my  
7 body, devastating mental anguish, constant pain, loss of normal life and  
8 ability to participate in everyday activities, it inhibits any possibility of  
9 holding employment and other activities of interest. The continues risks to  
10 my health preclude me from safely carrying more children. If I was properly  
11 informed by the Defendants that any of this could have happened I would  
12 have not undergo abortion.

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18 As a result of the injury caused by Defendants two metal stents were  
19 implanted in my body. If I was informed that there was any chance of this  
20 happening and of the constant debilitating pain I am suffering I would have  
21 not undergo abortion.

22  
23 Defendants owed a duty to me as a patient, they breached that duty, the  
24 breach of that duty injured me and caused me damages.

25  
26 I, Plaintiff Alena Kriley, am filing this complaint pro se stating the cause of  
27 action briefly to be able to comply with the statute of limitations. I did not  
28



1 discover several facts of Defendants misconducts until later. I did not  
2 discover immediately the harm caused by the Defendants. I will be  
3 amending my complaint to provide more details.  
4

### 5 6 7 **DAMAGES**

8 The Plaintiff wishes to be compensated for the devastating consequences  
9 that she suffered. For the mental anguish of loosing a child, for the pain and  
10 suffering, past and future medical expenses, for the devastating loss of  
11 ability to stand and walk for extended periods of time. For inability to lay on  
12 left side or stomach because of the pain, for inability to sleep without sleep  
13 medications due to pain. For loss of ability to work and enjoy life. For future  
14 expenses caused by Defendants.  
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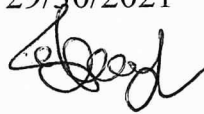
### 19 **PRAYER FOR RELIEF**

20 I, Plaintiff Alena Kriley, pray for judgement for compensatory damages in  
21 excess of \$75,000 and for punitive damages for the outrageous misconducts.  
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25 Date of signing:

29/30/2021

26 Signature of Plaintiff



27 Printed Name of Plaintiff

Alena Kriley